

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	No. 08 CR 888
	)	Hon. James B. Zagel
ROD BLAGOJEVICH, et al.	)	

**GOVERNMENT'S MOTION *IN LIMINE* TO ADMIT  
ADMISSION OF DEFENDANT**

The United States of America, by its attorney, Patrick J. Fitzgerald, United States Attorney for the Northern District of Illinois, respectfully moves the Court, *in limine*, to admit a video-recorded statement made by the defendant during a television interview on January 27, 2009. As discussed below, this statement is highly probative in rebutting the defendant's anticipated defenses concerning his state of mind at the time of the charged offenses, and should be admitted.

**BACKGROUND**

Defendant is charged with wire fraud, attempted extortion, conspiracy to commit extortion, solicitation of a bribe, and conspiracy to solicit a bribe, in violation of 18 U.S.C. §§ 1343, 1346, 1951(a), 666(a), and 371, in connection with a scheme to use the powers of the Office of the Governor of the State of Illinois to exchange official governmental actions for financial benefits, including